

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:21-cr-41-JL
)	
IAN FREEMAN)	
)	

MOTION FOR FINAL ORDER OF FORFEITURE

1. This Court entered a Preliminary Order of Forfeiture on February 9, 2024, forfeiting defendant Freeman’s interest in the following properties: (1) (21-FBI-004557) 315.44728106 DASH, seized from Ian Freeman; (2) (21-FBI-005179) \$14,100.00¹ U.S. Currency seized from Bitcoin ATM (General Bytes BT300470), taken from Bitcoin Embassy; (3) (21-FBI-005180) \$30,980.00 U.S. Currency seized from Campus Convenience Bitcoin ATM]; (4) (21-FBI-005447) One physical ‘1 BTC’ Casascius Bitcoin seized from Ian Freeman’s safe; (5) (21-FBI-005449) One physical ‘100 BTC’ Casascius Bitcoin “gold plated bearer bar” seized from Ian Freeman’s safe; (6) (21-FBI-005718) .9999783 BCH from physical '1 BTC' Casascius Bitcoin seized from Ian Freeman’s safe; (7) (21-FBI-005720) 99.99993098 BCH from physical '100 BTC' Casascius Bitcoin seized from Ian Freeman’s safe; (8) (21-FBI-005519) Misc. coins and ingots of precious metal seized from Ian Freeman’s safe: (A) U.S. \$0.10 silver dime sealed in plastic, (B) OPM sealed 1oz gold bars .999 fine; (C) PAMP sealed 1oz gold bar .999 fine; (D) \$1 Liberty dollar warehouse silver receipts 1/20 oz each; (E) \$5 Liberty dollar warehouse silver receipts 1/4 oz each; (F) \$10 Liberty dollar warehouse silver receipts 1/2 oz each; (G) \$20 Liberty dollar warehouse silver receipts; (H) Silver coins 1 1/2 oz .999 fine; (I) Silver coins 1 oz .999 fine; (J) Silver coins 2 oz .999 fine; (K) Silver coins in plastic cases 1 oz .999 fine; (L)

¹ This amount was erroneously listed as \$14,120.

Silver bullet 1 oz .999 fine; (M) Platinum Ron Paul coin 1 oz .999 fine, (N) OPM sealed 1oz gold bars .999 fine; (O) Australian 1 oz gold coin .999 fine; (P) Australian 2 oz silver coin .999 fine; (Q) Swiss of American 100 oz silver bar .999 fine; and (R) Copper coins; (9) (21-FBI-005553) \$179,672.00 U.S. Currency seized from Ian Freeman's safe; (10) (22-FBI-006754) 5.24279401 Bitcoin currently restrained in Blockchain Access UK Ltd user account 995c854f-7674-42ec-b465-43373a415ee5, in the name of Ian Freeman; (11) (21-FBI-005555) \$2,124.00 U.S. Currency seized from Ian Freeman's residence; (12) (21-FBI-005575) \$6,680.00 U.S. Currency seized from Murphy's Taproom Bitcoin ATM; (13) (21-FBI-005583) \$300.00 U.S. Currency seized from Red Arrow Diner Bitcoin ATM; (14) (21-FBI-004556), \$250,497.71 in U.S. Currency in the custody of the United States Marshals Service (15) (21-FBI-005719) \$40,880.95 in U.S. Currency in the custody of the United States Marshals Service; and (16) (21-FBI-005722) \$587,335.09² in U.S. Currency in the custody of the United States Marshals Service.³ DN 390.

2. The United States posted notice of this proceeding on an official government internet site (www.forfeiture.gov) for at least 30 consecutive days, beginning on February 17, 2024, pursuant to the provisions of 21 U.S.C. § 853(n) and Rule 32.2(b)(6)(C). DN 391. No parties filed timely claims by the post-publication claim deadline of April 17, 2024.

3. On January 31, 2024, Bonnie Kruse withdrew her claim to the assets listed in the Preliminary Order of Forfeiture. There are no other known potential third-party claimants to the assets listed in the Preliminary Order of Forfeiture. Accordingly, the court should enter a Final Order of Forfeiture. *See* Rule 32.2(c)(2).

² This amount was erroneously listed as \$587,335.19.

³ The FBI administratively forfeited (21-FBI-005574) \$610.00 U.S. Currency seized from Red Apple Diner on March 27, 2024.

4. Due to the nature of this Motion, no memorandum of law is necessary.

Therefore, the United States requests that this Court enter a Final Order of Forfeiture for:

(1) (21-FBI-004557) 315.44728106 DASH, seized from Ian Freeman; (2) (21-FBI-005179) \$14,100.00 U.S. Currency seized from Bitcoin ATM (General Bytes BT300470), taken from Bitcoin Embassy; (3) (21-FBI-005180) \$30,980.00 U.S. Currency seized from Campus Convenience Bitcoin ATM]; (4) (21-FBI-005447) One physical '1 BTC' Casascius Bitcoin seized from Ian Freeman's safe; (5) (21-FBI-005449) One physical '100 BTC' Casascius Bitcoin "gold plated bearer bar" seized from Ian Freeman's safe; (6) (21-FBI-005718) .9999783 BCH from physical '1 BTC' Casascius Bitcoin seized from Ian Freeman's safe; (7) (21-FBI-005720) 99.99993098 BCH from physical '100 BTC' Casascius Bitcoin seized from Ian Freeman's safe; (8) (21-FBI-005519) Misc. coins and ingots of precious metal seized from Ian Freeman's safe: (A) U.S. \$0.10 silver dime sealed in plastic, (B) OPM sealed 1oz gold bars .999 fine; (C) PAMP sealed 1oz gold bar .999 fine; (D) \$1 Liberty dollar warehouse silver receipts 1/20 oz each; (E) \$5 Liberty dollar warehouse silver receipts 1/4 oz each; (F) \$10 Liberty dollar warehouse silver receipts 1/2 oz each; (G) \$20 Liberty dollar warehouse silver receipts; (H) Silver coins 1//2 oz .999 fine; (I) Silver coins 1 oz .999 fine; (J) Silver coins 2 oz .999 fine; (K) Silver coins in plastic cases 1 oz .999 fine; (L) Silver bullet 1 oz .999 fine; (M) Platinum Ron Paul coin 1 oz .999 fine, (N) OPM sealed 1oz gold bars .999 fine; (O) Australian 1 oz gold coin .999 fine; (P) Australian 2 oz silver coin .999 fine; (Q) Swiss of American 100 oz silver bar .999 fine; and (R) Copper coins; (9) (21-FBI-005553) \$179,672.00 U.S. Currency seized from Ian Freeman's safe; (10) (22-FBI-006754) 5.24279401 Bitcoin currently restrained in Blockchain Access UK Ltd user account 995c854f-7674-42ec-b465-43373a415ee5, in the name of Ian Freeman; (11) (21-FBI-005555) \$2,124.00 U.S. Currency seized from Ian Freeman's residence; (12) (21-FBI-005575)

\$6,680.00 U.S. Currency seized from Murphy's Taproom Bitcoin ATM; (13) (21-FBI-005583)
\$300.00 U.S. Currency seized from Red Arrow Diner Bitcoin ATM; (14) (21-FBI-004556),
\$250,497.71 in U.S. Currency in the custody of the United States Marshals Service (15) (21-FBI-005719) \$40,880.95 in U.S. Currency in the custody of the United States Marshals Service; and
(16) (21-FBI-005722) \$587,335.09 in U.S. Currency in the custody of the United States
Marshals Service, and ordering the Federal Bureau of Investigation, or any appropriate federal
law enforcement agency, to dispose of the forfeited assets in accordance with the applicable law
and regulations.

Respectfully Submitted,

JANE E. YOUNG
United States Attorney

Date: April 22, 2024

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